

## **Exhibit 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**STIPULATION AND AGREED SCHEDULING ORDER**

This stipulation and agreed scheduling order (the “Stipulation”) is made and entered into by and among (i) FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), (ii) Boba Foundation, (iii) Fondation Serendipity, Fondation Elements, Serendipity Network Ltd and Liquidity Network Ltd (collectively, “Oxy”), (iv) Lavanda Sands L.L.C. (“LS”), (v) Maps Vault Limited (“Maps”), and (vi) TMSI SEZC Ltd. (“TMSI” and, together with Boba Foundation, Oxy, LS and Maps the “Objectors,” and together with the Debtors, the “Parties”), by and through their respective undersigned counsel. In support of this Stipulation, the Parties respectfully state as follows:

WHEREAS, on December 27, 2023, the Debtors filed the *Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “Motion”);

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

WHEREAS, on January 11, 2024, Boba Foundation filed the *Opposition of Boba Foundation to Motion of Debtors to Estimate Claims Based on Digital Assets and Request for Continued Hearing* [D.I. 5601] (the “Boba Objection”);

WHEREAS, on January 11, 2024, Oxy filed the *Preliminary Objection of Fondation Serendipity, Fondation Elements, Serendipity Networks Ltd and Liquidity Network Ltd to the FTX Debtors’ Motion to Estimate Claims Based on Digital Assets* [D.I. 5617] (the “Oxy Objection”);

WHEREAS, on January 11, 2024 LS filed the *Joinder in Preliminary Objection of Fondation Serendipity, Fondation Elements, Serendipity Networks Ltd and Liquidity Network Ltd to the FTX Debtors’ Motion to Estimate Claims Based on Digital Assets* [D.I. 5624] (the “LS Joinder”);

WHEREAS, on January 11, 2024, Maps filed the *Preliminary Objection of Maps Vault Limited to Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5620] (the “Maps Objection”);

WHEREAS, on January 11, 2024, TMSI filed the *Limited Objection of TMSI SEZC Ltd. to Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5626] (the “TMSI Objection”);

WHEREAS, on January 31, 2024, the United States Bankruptcy Court for the District of Delaware (the “Court”) held a hearing (the “Hearing”), and granted the Motion as set forth on the record of the Hearing;

WHEREAS, on February 7, 2024, the Court entered the *Order Granting Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 7090] (the “Order”), which excluded

certain Digital Assets to be valued following further proceedings as set forth in paragraph 9 of the Order (the “Deferred Digital Assets”);

WHEREAS the Parties have discussed in good faith a schedule with respect to the Deferred Digital Assets;

**NOW, THEREFORE**, it is hereby stipulated and agreed, and upon approval by the Court it shall be **SO ORDERED**:

1. Agreed Scheduling Order. The Parties agree to the following scheduling order (the “Agreed Scheduling Order”):

EVENT	DEADLINE
Maps to issue document requests	January 5, 2024
Debtors to respond to Maps’ document requests and produce non-privileged, responsive documents	On or before January 12, 2024
Deadline for Maps and Oxy to submit expert disclosures and report/rebuttal to Debtors’ disclosures/report	January 26, 2024
First Evidentiary Hearing	January 31, 2024
Deadline for Debtors to submit expert rebuttal report to Maps and Oxy	February 9, 2024
Deadline for Maps and Oxy to issue supplemental document requests and any interrogatories <sup>2</sup>	February 10, 2024
Deadline for TMSI and/or Boba to submit expert disclosures and report/rebuttal to Debtors’ disclosures/report	February 16, 2024
Deadline for Debtors to respond to Maps’ and Oxy’s supplemental discovery requests and produce non-privileged, responsive documents in response to the supplemental document requests	February 17, 2024

<sup>2</sup> The Debtors rights and defenses with respect to any discovery served are fully reserved.

Deadline for the Parties to Identify any Witnesses for the Evidentiary Hearing with Respect to the Deferred Digital Assets	February 21, 2024
Deadline for Debtors to submit any expert rebuttal report to TMSI and/or Boba	February 24, 2024
Deadline for Parties to complete expert depositions	March 1, 2024
Deadline for Objectors to file response to the Motion	March 8, 2024
Deadline for Debtors to file reply to Objectors' responses to Motion	March 17, 2024
Deadline for Parties to submit Joint Pretrial Order	March 18, 2024
Evidentiary Hearing on Motion with Respect to the Deferred Digital Assets	March 20, 2024

2. Pending approval of this Stipulation by the Court, each of the Parties agrees that it is and will be bound by this Stipulation and waives any right to object to approval by the Court.

3. If approved by the Court, the Agreed Scheduling Order shall be modified only by a writing signed by all Parties approved by the Court, or otherwise upon entry of an order of the Court entered upon notice to the Parties.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of the Proposed Scheduling Order.

Dated: February 7, 2024  
Wilmington, Delaware

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